

DATA PROTECTION POLICY

Eugropa attaches great importance to the protection and the lawful collection, processing and use of your data and the safeguarding of your privacy. In order to ensure the confidentiality of your data under the applicable statutory provisions of data protection law, we have taken technical and organisational measures to protect your data from manipulation, loss, destruction or access from unauthorised persons.

In the following, we shall inform you of the collection and processing of your personal data at Eugropa and the rights to which you are entitled in accordance with data protection law.

I. Name and contact details of the data controller and data protection officer

1. The data controller as defined by the General Data Protection Regulation (GDPR) and other national data protection legislation is

Europapier Group
Herr Helmut Limbeck
Autokaderstraße 86-96
A-1211 Wien
Österreich, Europa

Tel.: +43 1 277 78-0
Fax: +43 1 277 78
E-Mail: office@europapier.com

II. General information on data collection and purposes and legal bases of data processing

1. We process your personal data in line with the provisions of the GDPR.
2. We only process personal data as a rule if this is required to provide our services and a functioning web page. The individual data processed and how this is used are based on the commissioned or agreed services or the object of the intended, ongoing or concluded contractual relationship.
3. The primary purpose of data processing is to establish and fulfil a contractual relationship with you. If you make contact with us via a contact form, by phone, email or post, or by

other means, we store the data you disclose to be able to communicate with you. The overriding legal basis for this is Article 6, para. 1 b) GDPR. Your separate consent, in accordance with Article 6, para. 1 a), 7 GDPR, may also be called upon as a permission provision under data protection law. We also process your data in order to be able to fulfil our legal obligations, particularly in the realm of commercial and tax law. The basis for this is Article 6, para. 1 c) GDPR. If necessary, we also process your data on the basis of Article 6, para. 1 f) GDPR, in order to safeguard our legitimate interests or those of third parties.

III. Categories of personal data and duration of storage

1. Relevant personal data categories may include, in particular:
 - Personal details (title, first name, surname and similar)
 - Address/contact details (address, email address, telephone number and similar)

2. We delete your personal data as soon as the purpose of storage lapses. Once the contractual relationship has come to an end, your personal data shall be stored for as long as we are legally obliged to do so. This occurs regularly due to legal obligations to provide evidence and retain information which are set out in the German Commercial Code and Fiscal Code, among others. The storage periods are accordingly up to ten years. As part of this process, personal data may also be retained for the period in which claims may be asserted against us (statutory limitation period of three or up to thirty years).

IV. Transmission of data to third parties

1. Within our company, your personal data shall only be obtained by those persons and entities requiring said data to fulfil our contractual and legal obligations or as part of handling and implementing our legitimate interest. Your data is also transmitted to certain companies within our group which take care of central data processing tasks (e.g. marketing, IT support). Corresponding contract processing agreements have been concluded with these companies and compliance with statutory data protection provisions has been ensured.

2. Your personal data is only transmitted to third parties
 - if you have given us your explicit consent to said transmission in accordance with Article 6, para. 1 a) GDPR,
 - according to Article 6, para. 1 b) GDPR, insofar as this is required to perform the contractual relationship with you (e.g. logistics service providers),

- for the purposes of fulfilling legal stipulations, according to which we are obliged to disclose, report or pass on data (e.g. financial authorities) or the passing on of data is in the public interest (Article 6, para. 1 c) GDPR),
- insofar as external service providers process data on our behalf as processors or contractors (e.g. external IT centres, maintenance of telecommunications and IT facilities and/or applications, archiving, document processing, data destruction, purchasing/acquisition, advertising and marketing),
- on the basis of our legitimate interest or the legitimate interest of a third party in accordance with Article 6, para. 1 f) GDPR and insofar as there is no reason to assume that you have an overwhelming interest worthy of protection in your data not being passed on (e.g. credit agencies, commercial credit insurance, collection service providers, lawyers, courts, experts).

V. Collection of personal data on our website

1. Visiting our website

- 1.1 Each time our web page is accessed, our system automatically records data and information which your browser transmits to our server (known as 'server log files'). When you wish to view our web page, we collect data which is technically required for us to display our web page to you and ensure stability and security. The data is also stored in our system's log files. This data includes the IP address, date and time of the request, the content of the request (specific page), access status/HTTP status code, the amount of data transferred, the web page the request comes from, browser, operating system and its interface and language and version of the browser software. This data is not stored together with the user's other personal data. However, we reserve the right to retrospectively examine the server log files if there are specific indications of unlawful use.
- 1.2 The legal basis for the temporary storage of data and log files is Article 6, para. 1 f) GDPR. The temporary storage of the IP address by the system is required to enable the web page to be delivered to your browser. Your IP address must be stored for the duration of the session for this purpose. Storage in log files occurs in order to ensure the functionality of the web page. The data also helps us optimise the web page and ensure the security of our IT systems. These objectives are also the source of our legitimate interest in data processing in accordance with Article 6, para. 1 f) GDPR. The data is not evaluated for marketing purposes in this context.
- 1.3 The data is erased as soon as it is no longer required to achieve the purpose of its collection. In the event that data is recorded to provide the web page, this is the case when

the relevant session comes to an end. Log files are erased within 7 days of accessing the web page.

- 1.4 The collection of the data when visiting the web page and the storage of the data in log files is crucial for the operation of the web page. Accordingly, you do not have the option to object.
- 1.5 As well as the use of our website for purely informational purposes, we offer various services which you may use if interested. In order to do so, you usually need to provide additional personal data which we use to provide the relevant service and for which the above principles of data processing apply.
- 1.6 We sometimes use external service providers to process your data. They have been carefully selected and commissioned by us, are bound by our instructions and are regularly monitored. If our service providers or partners have their headquarters in a state outside of the European Economic Area (EEA), we shall inform you of the consequences of this circumstance in the description of the relevant service.
- 1.7 We may also pass on your personal data to third parties if participation in promotions, competitions, conclusion of contracts or similar services are offered by us together with partners. You will receive more detailed information in this regard when providing your personal data or below in the description of the relevant service.

2. Use of cookies

- 2.1 When you use our web page, cookies are stored on your computer system. Cookies are text files which are stored in the Internet browser or by the Internet browser on your computer system. If you access a web page, a cookie can be stored on your operating system. This cookie contains a characteristic string enabling clear identification of the browser when you access the web page again.
- 2.2 This web page uses the following types of cookies, whose scope and function are explained below:
 - Transient cookies (temporary use)
 - Persistent cookies (time-limited use)
 - Third-party cookies (from third-party providers according to separate information)

- 2.3 Transient cookies are automatically erased when you close the browser. These include session cookies, in particular. These store what is known as a session ID, with which various requests from your browser can be allocated to the overall session. This allows your computer to be recognised again when you return to a web page. The session cookies are erased when you log out or close the browser. The legal basis for processing personal data using transient cookies is Article 6, para. 1 f) GDPR. The purpose of using these cookies is to make it easier for you to use web pages. Some functions of our web page may not be provided without the use of cookies. For these functions, it needs to be possible to recognise the browser again even after switching pages. These objectives are also the source of our legitimate interest in processing personal data in accordance with Article 6, para. 1 f) GDPR.
- 2.4 Persistent cookies are only used in conjunction with the web analytics services we use and are only used for as long as is required for this purpose; they have a maximum lifespan of two years. You may delete the cookies in the security settings of your browser at any time. In that event, the functions and user-friendliness of the service may be limited. The legal basis for processing personal data using persistent cookies is Article 6, para. 1 f) GDPR. Analytics cookies are used for the purposes of improving the quality of our web page and its content. These analytics cookies help us learn how the web page is used and allow us to constantly improve our service. These objectives are also the source of our legitimate interest in processing personal data in accordance with Article 6, para. 1 f) GDPR.
- 2.5 Cookies which are not technically required to provide our service are only used with your consent, which you may revoke at any time. You agree with your continued use of the web page with the relevant browser setting to the use of cookies within the framework of this data protection policy. You can thus inform us of your consent through your browser settings, such as by specifying that you shall be informed of the use of cookies and that they shall only be accepted once you have explicitly confirmed this. In this way you can also specify that you authorise the acceptance of cookies for specific cases or on a general basis. You can configure your browser setting according to your wishes and manage, for instance, the acceptance or rejection of third-party cookies or all cookies. However, please note that it may not then be possible to use all functions of this web page. The legal basis for the processing of personal data using cookies for analytics purposes is, subject to the existence of consent in this regard from the user, Article 6, para. 1 a) GDPR.

3. Use of contact forms

- 3.1 We collect your personal data if you provide this to us of your own accord via our contact forms. We then record the relevant information which materialises in conjunction with contact being made. This includes, in particular, names and contact details provided and the date and occasion of contact being made. The personal data recorded concerning you

is only used for the purpose of providing you with the desired products or services and to correspond with you. Data processing occurs on the basis of Article 6, para. 1 b) GDPR.

- 3.2 The data is erased as soon as it is no longer required to achieve the purpose of its collection. For the personal data from the entry form in the contact form, this is the case when the relevant conversation with you has come to an end.

The conversation has come to an end if it can be gathered from the circumstances that the relevant matter has been dealt with conclusively. If the data disclosed is subject to retention obligations set out in tax and commercial law, it is stored for the duration of the retention obligations of ten years and then erased, unless you have consented to storage beyond this or further processing of the data is required for the assertion, exercise or defence of legal claims (statutory limitation period of three or up to thirty years).

6. Embedded YouTube videos

- 6.1 We have embedded YouTube videos in our online service which are stored on <http://www.youtube.com> and can be played directly from our web page.

These are all embedded in 'enhanced data protection mode', i.e. no data concerning you as a user is transferred to YouTube if you do not play the videos. Only if you play the videos will the data stated in para. 2 be transferred. We have no influence on this data transfer.

- 6.2 By visiting the web page, YouTube receives the information that you have accessed the relevant sub-page of our web page. This occurs irrespective of whether YouTube provides a user account that you are logged into or whether there is no user account. If you are logged in to Google, your data will be assigned directly to your account. If you do not wish it to be assigned to your YouTube profile, you must log out before activating the button. YouTube stores your data as a usage profile and uses it for the purposes of advertising, market research and/or appropriate design of their web page. This evaluation takes place in particular (even for users who are not logged in) to provide appropriate advertising and to inform other users on the social network of your activities on our web page. You have the right to object to the creation of these user profiles. To exercise this right, you must contact YouTube.
- 6.3 You can find more information on the purpose and scope of data collection and its processing by YouTube in the data protection policy. There, you will also find more information on your rights and setting options for the protection of your privacy: <https://www.google.de/intl/de/policies/privacy> Google also processes your personal

data in the USA and has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>

7. Embedded Twitter functions

7.1 Functions of the Twitter service are integrated on our sites. These features are available through Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. By using Twitter and the "Re-Tweet" feature, the web pages you visit will be linked to your Twitter account and shared with other users. This data is also transmitted to Twitter. We point out that we as the provider of the pages are not aware of the content of the transmitted data and their use by Twitter. For more information, see the Twitter Privacy Policy at <http://twitter.com/privacy>.

You can change your privacy settings on Twitter in the Account Settings at <http://twitter.com/account/settings>.

8. Embedding Google Fonts

8.1 We use the Google Fonts service on our web page. We use this service in the interest of displaying our web page in a uniform and appealing way. When accessing a page, your browser loads the required web fonts in your browser cache in order to correctly display texts and typefaces. If your browser does not support web fonts, a standard typeface from your computer is used. The legal basis for the use of Google Fonts is Article 6, para. 1 f) GDPR.

8.2 When you visit the web page, Google receives the information that you have accessed the relevant sub-page of our web page. This occurs irrespective of whether Google provides a user account that you are logged into or whether there is no user account. If you are logged in to Google, your data will be assigned directly to your account. If you do not wish it to be assigned to your Google profile, you must log out before activating the button. Google stores your data as a usage profile and uses it for the purposes of advertising, market research and/or appropriate design of their website. This evaluation takes place in particular (even for users who are not logged in) to provide appropriate advertising and to inform other users on the social network of your activities on our website. You have the right to object to the creation of these user profiles. To exercise this right, you must contact Google.

8.3 You can find more information on the purpose and scope of data collection and its processing by this provider in the provider's data protection policies.

There, you will also find more information on your rights and setting options for the protection of your privacy: <http://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. Opt-out:

<https://adssettings.google.com/authenticated>

9. Use of Google Analytics

- 9.1 This web page uses Google Analytics, a web analytics service from Google LLC ('Google'). Google Analytics uses what are known as 'cookies', text files which are stored on your computer and enable the analysis of your use of the website. The information generated by the cookie regarding your use of the web page are usually transferred to a Google server in the USA and stored there. If IP anonymisation is activated on this web page, however, your IP address is shortened in advance within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. On behalf of the operator of this web page, Google will use this information to evaluate your use of the web page, to compile reports regarding web page activities and in order to provide additional services associated with the web page use and Internet use for the web page operator.
- 9.2 The IP address transmitted by your browser as part of Google Analytics is - according to Google - not combined with other Google data.
- 9.3 You can prevent cookies from being stored with a corresponding setting on your browser software; however, please note that in that event, you may not be able to use all functions of this web page to their full extent. You may also prevent the recording of the data generated by the cookie concerning your use of the web page (including your IP address) for Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link:
<http://tools.google.com/dlpage/gaoptout?hl=de>.
- 9.4 This web page uses Google Analytics with the extension '_anonymizeIp()'. This allows IP addresses to be processed in shortened form, ruling out the identification of individual persons. Insofar as the data collected concerning you acquires a personal reference, this is therefore immediately ruled out and the personal data promptly deleted.

9.5 We use Google Analytics to allow us to analyse the use of our web page and improve it on a regular basis. With the statistics obtained, we are able to improve our service and make it more interesting for you as a user. For the exceptional cases in which personal data is transferred to the USA, Google has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for the use of Google Analytics is Article 6, para. 1 f) GDPR.

9.6 You can find more information on the purpose and scope of data collection and its processing by this provider in the provider's terms of use: <http://www.google.com/analytics/terms/de.html> and the provider's data protection policy: <http://www.google.de/intl/de/policies/privacy>. There, you will also find more information on your rights and setting options for the protection of your privacy: <http://www.google.com/intl/de/analytics/learn/privacy.html>. Google also processes your personal data in the USA and has signed up to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. Opt-out: <https://adssettings.google.com/authenticated>.

10. Data security

10.1 Within the web page visit, we use the common SSL (secure socket layer) procedure in conjunction with the highest level of encryption supported by your browser. This is usually 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can tell whether an individual page on our web presence is communicated in an encrypted form from the closed display of the key or castle symbol in the lower status bar of your browser.

10.2 We also use suitable technical and organisational security measures to protect your data from accidental or malicious manipulations, partial or total loss, destruction, or unauthorised access from third parties. Our security measures are subject to ongoing improvement in line with technological advances.

VI. Your rights

1. The applicable data protection law guarantees you comprehensive subjects' rights with regard to the processing of your personal data (rights to disclosure and intervention), as follows:

2. In accordance with Article 15 GDPR, you have the right to request access to the personal data processed by us concerning you. In particular, you may request access to the purposes of the processing, the category of personal data, the categories of recipient to whom your personal data has been or will be disclosed, the envisaged storage period, the existence of the right to rectification, erasure, restriction of processing or to object, the right to lodge a complaint, the data source, if it has not been collected by us, and the existence of automated decision-making, including profiling, as well as any meaningful information about the particularities.

3. In accordance with Article 16 GDPR, you may request the rectification without undue delay of inaccurate personal data stored by us concerning you or the completion of said data. In accordance with Article 17 GDPR, you have the right to request the erasure of the personal data stored by us concerning you, unless process is required for the exercise of the right to freedom of speech and information, the fulfilment of a legal obligation, on grounds of public interest or for the assertion, exercise or defence of legal claims.

4. In accordance with Article 18 GDPR, you have the right to request the restriction of processing of your personal data, insofar as the accuracy of the data is disputed by you, the processing is unlawful, you nevertheless refuse its erasure and we no longer require the data, you nevertheless require this for the assertion, exercise or defence of legal claims, or you have lodged an objection to the processing in accordance with Article 21.

5. In accordance with Article 20 GDPR, you have the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or request its transmission to another controller.

6. In accordance with Article 7, para. 3 GDPR, you have the right to withdraw consent you have previously given to the processing of your data from us at any time. Any such withdrawal influences the permissibility of processing your personal data once you have declared it to us.

If our processing of your personal data is based on the weighing up of interests, you can lodge an objection to processing. This occurs, in particular, if processing is not required for the fulfilment of a contract with you, which is outlined by us in each case for the previously described functions. If any such objection is exercised, we ask for an explanation of the reasons why we should not process your personal data as we have done. In the event of your justified objection, we assess the situation and shall either cease or modify data processing or indicate to you our mandatory grounds worth protecting for continued processing.

You may naturally object to the processing of your personal data for the purposes of marketing and data analysis at any time. In order to do this, you may use the link available in every newsletter or inform us of your objection to marketing using the following contact details:

Europapier Group
Herr Helmut Limbeck
Autokaderstraße 86-96
A-1211 Wien
Österreich, Europa

Tel.: +43 1 277 78-0

Fax: +43 1 277 78

E-Mail: office@europapier.com

7. In accordance with Article 77 GDPR, you also have the right to lodge a complaint with a supervisory authority regarding our processing of your personal data, namely to the state officer for data protection and freedom of information responsible for us in Österreichische Datenschutzbehörde, Barichgasse 40-42, 1030 Wien, telephone: +43 1 52 152-0, email: dsb@dsb.gv.at.